

1 **KEN THERRIEN**
2 **413 NORTH SECOND STREET**
3 **YAKIMA, WA 98901**
4 **509.457.5991**

5 Attorney for:
6 MORRIS BRUCE JACKSON
7

8 **UNITED STATES DISTRICT COURT**
9 **FOR THE EASTERN DISTRICT OF WASHINGTON**
10 **(Honorable Salvador Mendoza, Jr.)**

12 UNITED STATE OF AMERICA,) NO. 19-CR-2039-SMJ
13 vs. Plaintiff,)
14) DEFENDANT'S CORRECTIONS
15) AND COMMENTS TO PSIR
16 MORRIS BRUCE JACKSON,)
17 Defendant.)

19 TO: VANESSA R. WALDREF, United States Attorney
20 AND TO: THOMAS HANLON, Assistant United States Attorney
21 AND TO: RICHARD C. BURSON, Assistant United States Attorney
22 AND TO: JENNIFER DYKSTRA, United States Probation Officer

23 Morris Bruce Jackson, by and through his attorney of record, Ken Therrien
24 hereby submits his Corrections and Comments to the PSIR in preparation for his
25 sentencing hearing scheduled for April 26, 2022 at 9:00 a.m. in Yakima, Washington.

26 //

27 //

28 //

29 //

30 DEFENDANT'S CORRECTIONS AND COMMENTS TO
31 PSIR
Page 1

KEN THERRIEN, PLLC
413 NORTH SECOND STREET
YAKIMA, WA 98901
(509) 457-5991

1 **Morris Bruce Jackson Corrections and Comments to the Preliminary Sentence**
2 **Investigation Report (ECF 102) dated March 22, 2022**

3
4 Page 2: Mr. Jackson reports he obtained his GED from Goldendale Alternative High
5 School 2001 and his DOB August 7, 1978

6 Page 3: Paragraph 4 typo, July 19, 2019 (2010) in PSIR

7 Page 5: Paragraph 21 line 3, Mr. Jackson believes in spoke to Mr. Cagle inside the
8 residence first.

9
10 Page 5: Paragraph 23, typo should read "loud" music

11 Page 6: Paragraph 26 - 4th line Mr. Jackson believe should read: James" approached
12 him not Donovan.

13 Page 16: Paragraph 121-122 Mr. Jackson reports someone was using his name. This
14 almost got him fired from his DNR fire fighter job.

15
16 Page 17: Paragraph 125 - Mr. Jackson doesn't remember this charge.

17 Page 17-18: Paragraph 131- Mr. Jackson believes this was dropped by the police.

18
19 Page 18: Paragraph 134 - Mr. Jackson reports beat up by his brother.

20 Page 18: Paragraph 135 - Mr. Jackson never heard of this case until now.

21 Page 21: Paragraph 148 - Mr. Jackson reports he has rotten back teeth exposure of
22 nerves very painful.

23 Page 21: Paragraph 149 - Mr. Jackson reports night terrors, he has had one recently.

24 Page 21: Paragraph 154 - Mr. Jackson reports transportation was a problem.

25
26 Page 21: Paragraph 155 - Mr. Jackson reports GED from Goldendale Community
27 College (see page 2 above)

1 DATED this 5th day of April, 2022.
2
3

4 */s/ Ken Therrien*
5 KEN THERRIEN, WSBA #20291
6 Attorney for Defendant
7
8

9 **CERTIFICATE OF SERVICE**

10 I hereby certify under penalty of perjury of the laws of the State of Washington that on
11 April 5, 2022, I electronically filed the foregoing with the Clerk of the Court using the
12 CM/ECF System which will send notification of such filing to the following:

13 • Thomas Hanlon, Assistant United States Attorney
14 • Richard C. Burson, Assistant United States Attorney
15 • Jennifer Dykstra, USPO via email
16
17

18 *s/ Ken Therrien*
19 KEN THERRIEN, WSBA #20291
20 Attorney for Morris Bruce Jackson
21 413 North Second Street
22 Yakima, WA 98901
23 (509) 457-5991
24 Fax: (509) 457-6197
25 kentherrien@msn.com
26
27
28
29
30
31